

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

INDICTMENT

- v. -

07 Cr. 1171

ERICK ZAK,
a/k/a "Erick Aguillo,"
DANNY VALENZUELA,

Defendants.

The Grand Jury charges:

1. From at least in or about April 2007 through at least in or about July 2007, in the Southern District of New York and elsewhere, ERICK ZAK, a/k/a "Erick Aguillo," and DANNY VALENZUELA, the defendants, and others known and unknown, unlawfully, intentionally and knowingly, did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and object of the conspiracy that ERICK ZAK, a/k/a "Erick Aguillo," and DANNY VALENZUELA, the defendants, and others known and unknown, unlawfully, intentionally, and knowingly, would distribute and possess with intent to distribute a controlled substance, to wit, five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 812, 841(a), and 841(b)(1)(A).

OVERT ACTS


3. In furtherance of the conspiracy and to effect the illegal objects thereof, ERICK ZAK, a/k/a "Erick Aguillo," and DANNY VALENZUELA, the defendants, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about July 18, 2007, VALENZUELA shipped a package containing cocaine from Arizona to an apartment building in Piermont, New York.

b. On or about July 20, 2007, ZAK traveled to an apartment building in Piermont, New York to obtain a quantity of cocaine.

(Title 21, United States Code, Section 846.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney